

Exhibit J

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re	:	Chapter 11
	:	
MOTORS LIQUIDATION COMPANY, <i>et al.</i>, f/k/a General Motors Corp., <i>et al.</i>	:	Case No.: 09-50026 (REG)
	:	
Debtors.	:	(Jointly Administered)
	x	

**ORDER GRANTING MOTION OF GENERAL MOTORS LLC
PURSUANT TO 11 U.S.C. §§ 105 AND 363 TO ENFORCE
THE COURT'S JULY 5, 2009 SALE ORDER AND INJUNCTION**

Upon the Motion, dated April 21, 2014 ("**Motion**"), of General Motors LLC ("**New GM**"),¹ pursuant to Sections 105 and 363 of the Bankruptcy Code, seeking the entry of an order to enforce the Sale Order and Injunction, entered by the Court on July 5, 2009, by directing the Plaintiffs in the Ignition Switch Actions (a) to cease and desist from further prosecuting against New GM, or otherwise pursuing against New GM, the claims asserted by them in the Ignition Switch Actions that are barred by the provisions in the Sale Order and Injunction, and the MSPA, (b) to dismiss, with prejudice, those claims asserted in the Ignition Switch Actions that violate the provisions of the Sale Order and Injunction, and MSPA, and (c) to show cause whether they have any claims not barred and enjoined by the Sale Order and Injunction, all as more fully set forth in the Motion; and due and proper notice of the Motion having been provided to counsel for the Plaintiffs, MLC and the U.S. Trustee, and it appearing that no other or further notice need be given; and a hearing (the "**Hearing**") having been held with respect to the Motion on _____, 2014; and upon the record of the Hearing, the Court having found

¹ Capitalized terms used and not otherwise defined herein shall have the meanings ascribed to such terms in the Motion.

and determined that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefore:

THE COURT FINDS AND DETERMINES THAT

1. The Court has jurisdiction to consider the relief requested in the Motion pursuant to 28 U.S.C. §§ 157 and 1334, and Paragraph 71 of the Sale Order and Injunction.
2. The relief requested in the Motion is a core proceeding pursuant to 28 U.S.C. § 157(b).
3. Venue of the Motion before this Court is proper pursuant to 28 U.S.C. §§ 1408 and 1409.
4. The claims and/or causes of action asserted against New GM in the Ignition Switch Actions concern Retained Liabilities associated with vehicles, and/or replacement parts in vehicles, designed, manufactured and/or sold by Old GM, including, without limitation, claims or causes of action that are based on (a) express warranty, other than the Glove Box Warranty, (b) implied warranty, (c) implied obligations under statute or common law, (d) successor liability, (e) design defect, (f) tort, contract or otherwise, or (g) the conduct of Old GM.
5. The Plaintiffs were given the opportunity to show cause why any of the claims and/or causes of action asserted against New GM in the Ignition Switch Actions do not constitute Retained Liabilities, and Plaintiffs have been unable to provide satisfactory evidence demonstrating that any of the claims and/or causes of action asserted against New GM in the Ignition Switch Actions should not be barred and enjoined.

NOW, THEREFORE, IT IS HEREBY

ORDERED that the Motion is GRANTED as set forth herein; and it is further

ORDERED that the Plaintiffs shall dismiss, with prejudice, on or before _____, 2014, the Ignition Switch Actions set forth in Schedule “1” to the Motion; and it is further ORDERED that the Plaintiffs and all persons acting in concert with them shall cease and desist from prosecuting the Ignition Switch Actions against New GM; and it is further ORDERED that, within 10 business days after the entry of this Order, each of the Plaintiffs shall file with the Clerk of this Court evidence of the dismissal, with prejudice, of their individual Ignition Switch Actions; and it is further ORDERED that New GM shall be authorized to serve this Order upon any additional party (and/or their attorney) who commences an action (“**Additional Action**”) against New GM that is substantially similar to the relief requested in the Ignition Switch Actions and, if such additional party fails or refuses to dismiss, with prejudice, such Additional Action, New GM shall be permitted to seek expedited relief in this Court seeking, among other things, similar relief for the Additional Actions to that granted hereunder in respect of the Ignition Switch Actions.

Dated: _____, 2014
New York, New York

UNITED STATES BANKRUPTCY JUDGE